

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Civil Action No. 5:19-cv-249-FL**

MATTHEW BRADLEY,)	ANALYTICAL GRAMMAR, INC.'S MOTION FOR ATTORNEYS' FEES, COSTS AND EXPENSES PURSUANT TO 28 U.S.C. § 1927 AND THE COURT'S INHERENT AUTHORITY
Plaintiff,)	
v.)	
ANALYTICAL GRAMMAR, INC.,)	
Defendant.)	
)	

Pursuant to Rule 54(d) of the Federal Rules of Civil Procedure, Defendant Analytical Grammar, Inc. (“Analytical”) hereby moves for an award of its reasonable attorneys’ fees, costs, and expenses.

Analytical respectfully requests an award of its attorneys’ fees incurred in this action in the amount of \$177,801.10 and of its costs and expenses incurred in the amount of \$6,689.32, against Plaintiff Matthew Bradley’s former lead counsel Richard Liebowitz and Liebowitz Law Firm, PLLC, jointly and severally, pursuant to 28 U.S.C. § 1927 and the Court’s inherent authority.

The instant motion is based on the memorandum of points and authorities filed in support herewith; the accompanying declarations of Matthew Bradley, Erin Karl, Dan Booth, Christopher Thomas, and Ed Timberlake, and their exhibits; the papers on file in this matter; and on such other evidence or argument as the Court may consider in a hearing on this matter.

WHEREFORE, Analytical moves for an award of attorneys’ fees in the amount of \$177,801.10 and of costs and expenses in the amount of \$6,689.32 in total, to be entered against Richard Liebowitz and Liebowitz Law Firm, PLLC jointly and severally.

Respectfully submitted this 8th day of July, 2021.

Analytical Grammar, Inc.

By its attorneys:

DAN BOOTH LAW LLC

/s/ Dan Booth
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Local Civil Rule 83.1(e) Special Appearance

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Local Civil Rule 83.1(d) Counsel

CERTIFICATE OF SERVICE

I, Dan Booth, hereby certify that on July 8, 2021, true copies of Analytical Grammar, Inc.'s foregoing Motion for Attorneys' Fees, Costs, and Expenses Pursuant to 28 U.S.C. § 1927 and the Court's Inherent Authority, the supporting memorandum of points and authorities, and the accompanying declarations of Dan Booth, Erin Karl, Christopher Thomas, and Ed Timberlake submitted herewith, were electronically filed using the Court's CM/ECF system, which will send notification of such filing to the following counsel of record:

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July 8, 2021

/s/ Dan Booth
Daniel G. Booth